

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
IRON MOUNTAIN INCORPORATED;)	
IRON MOUNTAIN INFORMATION)	
MANAGEMENT, INC.; C. RICHARD)	
REESE; JOHN F. KENNY, JR.; GARRY)	
B. WATZKE; LARRY L. VARN; and)	Civil Action
CHARLES G. MOORE,)	No. 05 10890 RCL
)	
Plaintiffs,)	
)	
v.)	
)	
THOMAS CARR,)	
)	
Defendants.)	
_____)	
)	
IRON MOUNTAIN INFORMATION)	
MANAGEMENT, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	05 10999 RCL
SYSTRANS FREIGHT SYSTEMS, INC.,)	
)	
Defendant.)	
_____)	

MOTION FOR LEAVE TO FILE REPLY MEMORANDUM

Pursuant to Local Rule 7.1(b)(3), Plaintiffs and Counterclaim-Defendants Iron Mountain Incorporated, Iron Mountain Information Management, Inc., C. Richard Reese, John F. Kenny, Jr., Garry B. Watzke, Larry L. Varn and Charles G. Moore (together, "Plaintiffs") hereby move for leave to file a joint reply memorandum in further support of their motions for summary judgment. Plaintiffs believe that a brief reply memorandum of *five pages or less* would be appropriate and helpful in fully delineating the issues before the Court, in particular the lack of

any material issue of fact created by Defendant Carr's submissions, and that the Court's resources will be most efficiently used if Plaintiffs are permitted to respond in writing to the new issues, misstatements and questions raised in the Defendant's opposition papers in a reply memorandum.

Certification Pursuant to Local Rule 7.1

Counsel for Plaintiffs hereby certifies that he contacted counsel for Defendant and attempted in good faith to narrow or resolve the issues raised in this motion. Counsel for Defendant would not consent to this motion.

/s/ Kevin M. Colmey _____

Dated: July 13, 2007

Respectfully submitted,

**IRON MOUNTAIN INCORPORATED,
IRON MOUNTAIN INFORMATION
MANAGEMENT, INC., C. RICHARD
REESE; JOHN F. KENNY, JR.; GARRY
B. WATZKE; LARRY L. VARN; AND
CHARLES G. MOORE**

By their attorneys,

/s/ Ira K. Gross _____
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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 13, 2007.

/s/ Kevin M. Colmey _____